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August 3, 2023

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
500 Pearl Street  
New York, New York 10007

Re: *E. Jean Carroll v. Donald J. Trump*  
20 Civ. 7311 (LAK)

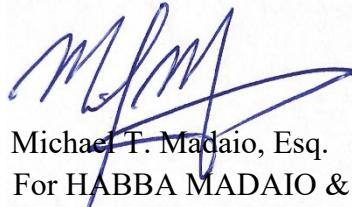
Dear Judge Kaplan:

On July 19, 2023, this Court directed the parties to “file a motion setting forth precisely each fact or proposition of law, if any, as to which the moving party claims *Carroll II* has preclusive effect in this action.” *See* ECF 178. Plaintiff subsequently submitted a letter to the Court, *see* ECF 182, seeking permission to submit “any targeted summary judgment motions” addressing the preclusive effect of *Carroll II*. To date, Plaintiff’s request has not been addressed by this Court.

Given that the Court did not expressly invite the parties to submit motions for summary judgment, Defendant objects to the form of Plaintiff’s motion for partial summary judgment, as it seemingly exceeds the scope of the Court’s directive. To the extent this Court deems Plaintiff’s motion acceptable, Defendant respectfully requests 21 days to file an opposition to Plaintiff’s motion. This period of time aligns with the Court’s prior mandate setting forth the applicable deadlines for summary judgment motions. *See* ECF 102. In the interest of judicial economy, Defendant would have no objection to similarly extending Plaintiff’s time to respond to Defendant’s motion.

We thank the Court for its courtesy and attention to this matter.

Respectfully submitted,



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For HABBA MADAIO & ASSOCIATES LLP

cc: Counsel of Record